### **REMARKS/ARGUMENTS**

### Claim Rejections - 35 USC § 102

Claims 1-3, 5-6, and 8-12 are rejected under 35 U.S.C. 102(a) as being anticipated by applicant's admitted prior/related art.

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1. Regarding the 35 U.S.C. 102 rejection of Claim 1

#### **Response**:

First of all, please note that the subject matter of claim 1, "[a] video decoding method," is characterized by the preamble "[a] video decoding method for predicting a current block of a picture." (emphases added) Thus, the limitation "for predicting a current block" mentioned in the preamble and the term "previous product" mentioned in some steps of claim 1 are indeed meaningful, and already limit the whole claim scope of claim 1 to be different from the operations of applicant's admitted related art.

In view of this, applicant respectfully points out that Examiner misinterprets the teachings of applicant's admitted related art to make the 35 U.S.C. 102 rejection of claim 1. Examiner first identifies the storing step mentioned in claim 1 as the multiplier 411 in Fig. 4, and further identifies the reading step mentioned in claim 1 as Step 34 in Fig. 3. However, the storing step mentioned in claim 1 is characterized by the limitations "storing at least one previous product in a memory, wherein the previous product corresponds to a block of a plurality of blocks of the picture, and the previous product is the product of a quantized AC coefficient and a quantization scale of the block that the previous product corresponds to" which are different from the operation of the multiplier 411 in Fig. 4. (*emphases added*) In addition, the reading step mentioned in claim 1 is characterized by the limitations "reading from the memory at least one previous product corresponding to the prediction block" which are different from the operation of Step 34 in Fig. 3. (*emphases added*)

Please refer to applicant's Fig. 4. In fact, the multiplier 411 in Fig. 4 multiplies the inputs thereof to generate a **current** product, which is different from the **previous** product mentioned in claim 1. (*emphases added*) In addition, the operation of the multiplier 411 in Fig. 4 is "**multiplying**", rather than "**storing**." (*emphases added*) Thus, the multiplier 411

in Fig. 4 fails to disclose the claimed feature "storing at least one previous product in a memory." (*emphases added*)

Please refer to applicant's Fig. 3. Step 34 is an operation of "reading from the memory the quantized AC coefficients corresponding to the prediction block;" which is different from the operation of "reading from the memory at least one previous product corresponding to the prediction block" mentioned in claim 1. (*emphases added*) Thus, Step 34 in Fig. 3 fails to disclose the claimed feature "reading from the memory at least one previous product corresponding to the prediction block."

Please note that the operation of "storing at least one previous product in a memory" mentioned in claim 1 cannot be achieved by the conventional architecture shown in applicant's Fig. 4. The conventional architecture shown in applicant's Fig. 4 cannot store such a product, and more particularly, cannot store any previous product. The conventional architecture shown in applicant's Fig. 4 only multiplies the inputs thereof to generate a **current** product and then discards the **current** product each time, rather than storing the **current** product for being utilized as a **previous** product for the next time.

Therefore, for at least the above reasons, the applicant respectfully asserts that claim 1 of the present invention should not be found anticipated by applicant's admitted related art. That is, claim 1 is patentable over applicant's admitted related art. Withdrawal of the rejection and reconsideration of claim 1 are respectfully requested.

2. Regarding the 35 U.S.C. 102 rejections of claims 2-3, 5-6, and 8-12

#### **Response**:

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First, claims 2-3, 5-6, and 8-12 are dependent on claim 1, and should be allowed if claim 1 is found allowable. Further reasons for consideration of withdrawal of the rejections of certain claims are described below.

## Claim 3

In light of the above statements for claim 1, applicant respectfully asserts that the claimed features of claim 3 are not anticipated by applicant's admitted related art. Please

note that claim 3 further includes detailed characteristics of the at least one **previous** product mentioned in claim 1. As applicant's admitted related art fails to disclose such a **previous** product, applicant's admitted related art also fails to disclose the detailed characteristics of the at least one **previous** product mentioned in claim 3. Thus, claim 3 is patentable over applicant's admitted related art. Reconsideration of claim 3 is respectfully

#### Claim 9

requested.

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In light of the above statements for claim 1, applicant respectfully asserts that the claimed features of claim 9 are not anticipated by applicant's admitted related art. Please note that claim 9 further includes detailed characteristics of the at least one **previous** product that is read in the reading step mentioned in claim 1. As applicant's admitted related art fails to disclose such a **previous** product, applicant's admitted related art also fails to disclose the detailed characteristics of the at least one **previous** product mentioned in claim 9.

In addition, the at least one **previous** product mentioned in claim 9 is described as "the at least one **previous** product **read**", i.e. "the at least one **previous** product that is read in the reading step mentioned in claim 1." As applicant's admitted related art fails to disclose the claimed features of "**reading** from the memory at least one **previous** product corresponding to the prediction block" mentioned in claim 1, applicant's admitted related art also fails to disclose the detailed characteristics regarding "the at least one **previous** product **read**" mentioned in claim 9. Thus, claim 9 is patentable over applicant's admitted related art. Reconsideration of claim 9 is respectfully requested.

## 25 Claim Rejections - 35 USC § 103

Claim 7 is rejected under 35 U.S.C. 103(a) as being unpatentable over applicant's admitted prior/related art.

# Response:

First, claim 7 is dependent on claim 1, and should be allowed if claim 1 is found allowable. In addition, Examiner made a statement with regard to "a register",

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but using it as a basis of the 35 U.S.C. 103 rejection of claim 7 is improper and unreasonable. In light of the above statements for claim 1, even "a register" is utilized in the multiplier 411 in Fig. 4, the multiplier 411 still fails to disclose the storing step mentioned in claim 1 since the multiplier 411 merely multiplies the inputs thereof to generate a **current** product, **which is different from** the **previous** product mentioned in claim 1. (*emphases added*) In brief, the multiplier 411 in Fig. 4 is for generating the **current** product rather than the **previous** product mentioned in claim 1.

As applicant's admitted related art fails to disclose the claimed features regarding the **previous** product mentioned in claim 1, applicant's admitted related art also fails to disclose the claimed features regarding **the memory** mentioned in claim 1 (e.g. "storing at least one **previous** product in a **memory**" in the storing step), and even fails to disclose the detailed features regarding **the memory** mentioned in claim 7. (*emphases added*) Therefore, claim 7 is patentable over applicant's admitted related art in view of Examiner's note regarding "the register." Reconsideration of claim 7 is respectfully requested.

## **Allowable Subject Matter**

Applicant appreciates and acknowledges the allowability of claim 4.

#### 20 Allowability of Newly Added Claims

Claims 21-23 are fully supported by the corresponding embodiment of the disclosed application. Consideration of newly added claims 21-23 is respectfully requested.

For accelerating the prosecution, please note that the newly added claims 21-23 are modified from original claim 1, and are explained as follows. In claim 21, the storing step is modified to emphasize that the storing operation is performed in advance before processing the current block. In claim 22, the storing step is modified to emphasize that the storing operation is performed when processing at least one previous block of a plurality of blocks of the picture, and the determining step is modified to emphasize that the determining operation is performed for the

current block. In claim 23, the reading step is modified to emphasize that the reading operation is performed "rather than reading from the memory a current product

when processing the current block". (emphases added)

art. Consideration of claims 21-23 is therefore respectfully requested.

In view of above arguments of clam 1, the applicant asserts that above-identified features recited in claims 21-23 are not taught or suggested by applicant's admitted related

**Conclusion:** 

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Thus, all pending claims are submitted to be in condition for allowance with respect to the applicant's admitted related art for at least the reasons presented above.

Applicant respectfully requests that a timely Notice of Allowance be issued in this case.

Sincerely yours,

15 <u>/Winston Hsu/</u> Date: <u>12/08/2008</u>

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D.C. is 13 hours behind the Taiwan time, i.e. 9 AM in D.C. = 10 PM in Taiwan.)

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